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March 20, 2024

BY ECF

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: **Stella Cicarone v. Center for Goods, LLC, et al.,**
24-CV-991 (LGS)

Your Honor:

This firm represents Center for Goods, LLC d/b/a Roman and Williams; Roman and Williams Guild; La Mercerie and Guild Gallery, and Robin Standefer (hereinafter “Defendants”) in the above-mentioned matter. Pursuant to Rule I.B.3. of Your Honor’s Individual Rules, Defendants write to respectfully request that the Court adjourn the initial conference, scheduled for March 27, 2024, *sine die* for the reasons discussed below. (ECF No. 10). Accordingly, Defendants also request that the deadline for the filing of a joint letter, due today, be extended *sine die*. This is Defendants’ first request to adjourn the initial conference and deadline for filing a joint letter. Counsel for Plaintiff, Jason L. Solotaroff, consents to this request.

On February 9, 2024, Plaintiff filed the Complaint in this action. (ECF No. 1). On March 1, 2024, counsel for Plaintiff’s emailed Defendant Robin Standefer to request a waiver of service. On March 19, 2024, the undersigned met and conferred with counsel for Plaintiff to discuss, among other issues, Defendants’ willingness to execute the waiver. In accordance with the waiver, Defendants have until April 30, 2024 to file an answer, or otherwise respond to the Complaint. Typically, initial conferences are held after the filing of an answer and pursuant to this District’s Second Amended Standing Administrative Order, employment cases are referred to mediation. As of the date of this letter, an Answer has not been filed, which would usually trigger the referral to mediation. Accordingly, this is a reason for the adjournment of the scheduled initial conference.

Application DENIED. The initial pretrial conference will proceed as scheduled. The parties shall jointly submit the materials described in the Order at Dkt. 10 by **March 25, 2024**.

Dated: March 22, 2024
New York, New York

A handwritten signature in black ink, appearing to read "Lorna G. Schofield", written over a horizontal line.

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE



For the reasons set forth above, Defendants respectfully request that the Court adjourn the initial conference and extend the filing deadline of the joint letter *sine die*.

Sincerely,

/s/ Nicholas L. Collins
Nicholas L. Collins

cc: **VIA ECF**
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